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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

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(1) UNITHERM FOOD SYSTEMS, INC.,  
an Illinois corporation; AND  
(2) JENNIE-O FOODS, INC.,  
a Minnesota corporation,

Plaintiffs,

-vs-

Case File No. CIV-01-347-C

(1) SWIFT-ECKRICH, INC, d/b/a  
CONAGRA REFRIGERATED FOODS,  
a Delaware corporation,

Defendant.

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VOLUME I  
RULE 30(b)(6) DEPOSITION OF  
JENNIE-O FOODS, INC.  
TESTIMONY OF ROBERT J. WOOD

ORIGINAL

SEPTEMBER 11, 2001

1:30 P.M.



Mary Pierson, RPR  
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EXHIBIT O

PTO-003320

1       that had a piece of equipment that they were trying to  
2       sell, I'm sure there was a brochure that was sent to me.  
3       However, I get numerous publications from equipment  
4       manufacturers and suppliers on a daily basis. I don't  
5       know.

6       Q. At this time, was it your understanding that Unitherm was  
7       offering to sell Jennie-O an oven or a process or both?

8       A. It was my understanding that Unitherm had a process that  
9       was able to prepare the surface, apply liquid smoke and  
10       set liquid smoke, and we had tried for several months to  
11       come up with a process. And subsequently, after seeing  
12       the product and Mr. Dierenfeld going to Ponca City to  
13       look at the equipment, he came back to me, and I asked  
14       him what it was all about. And his explanation to me  
15       was, you know, what Unitherm had and they had -- they had  
16       all the pieces that we couldn't figure out. They had it  
17       already designed and available for commercial sales.

18       Q. Prior to this time, to your knowledge had Jennie-O dealt  
19       with Unitherm?

20       A. To my knowledge, no.

21       Q. Had you ever dealt with Unitherm?

22       A. No.

23       Q. You said that Mr. Dierenfeld went to Ponca City to see  
24       the process.

25       A. After Unitherm had -- we had sent samples to Unitherm.